

**CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Tuthill Corporation, Fill-Rite Division
8825 Aviation Drive
Fort Wayne, Indiana 46809**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 003-15783-00238	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 29, 2002 Expiration Date: July 29, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 and A.2 are descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metal fluid pump coating source.

Authorized Individual: Russ Deter
Source Address: 8825 Aviation Drive, Fort Wayne, Indiana 46809
Mailing Address: 8825 Aviation Drive, Fort Wayne, Indiana 46809
Phone Number: 260-747-7529
SIC Code: 3561
County Location: Allen County
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Four (4) spray paint booths, known as B-1 through B-4, equipped with four (4) airless spray guns, known as A-1 through A-4, and dry filters to control overspray, exhausting through Stacks B-1 through B-4, capacity: 100 pumps per hour, total.
- (b) One (1) natural gas-fired waste water evaporator, known as EV-1, exhausting to Stack EV-1, heat input capacity: 0.353 million British thermal units per hour.
- (c) One (1) natural gas-fired roof top heater, known as RTU-1, constructed in 1996, heat input capacity: 0.180 million British thermal units per hour.
- (d) One (1) natural gas-fired roof top heater, known as RTU-2, constructed in 1996, heat input capacity: 0.080 million British thermal units per hour.
- (e) Four (4) natural gas-fired roof top heaters, known as RTU-3 through RTU-6, constructed in 1996, heat input capacity: 0.250 million British thermal units per hour, each.
- (f) One (1) natural gas-fired roof top heater, known as RTU-7, constructed in 1996, heat input capacity: 0.150 million British thermal units per hour.
- (g) Three (3) natural gas-fired roof top heaters, known as RTU-8 through RTU-10, heat input capacity: 0.180 million British thermal units, each.
- (h) Two (2) natural gas-fired air make up units, known as AMU-1 and AMU-2, constructed in 1996, heat input capacity: 8.25 million British thermal units per hour, each.

- (i) One (1) natural gas-fired two (2) stage caustic water parts cleaner, known as PC-1, constructed in 1996, exhausting to Stack PC-1, heat input capacity: 0.180 million British thermal units per hour.
- (j) One (1) natural gas-fired flash tunnel, known as FT-1, constructed in 1996, exhausting through Stack FT-1, heat input capacity: 3.757 million British thermal units per hour.
- (k) One (1) self-contained dehydrator, known as D-1, capacity: 10 pounds of moisture removal per hour (no emissions).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction of the new emission units is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled, "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications or amendments of this permit do not affect the expiration date.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7]

- (a) The total source potential to emit of VOC, PM, PM₁₀, NO_x, SO₂ and CO are less than two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit PM₁₀, SO₂, VOC, NO_x or CO to 100 tons per year from this source, shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Hazardous Air Pollutants (HAPS) [326 IAC 2-7]

Any change or modification which may increase potential to emit to ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.3 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.4 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to 326 IAC 2-6.1-6(d)(3):

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.7 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.8 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.9 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.10 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

Testing Requirements

C.11 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

- (a) Compliance testing on new emissions units shall be conducted within sixty (60) days after achieving maximum production rate, but no later than one hundred eighty (180) days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.12 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.13 Maintenance of Monitoring Equipment [IC 13-14-1-13]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour this time frame is determined on a case by case basis until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 1-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall

amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.17 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a) (1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.18 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a

violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.21 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: metal fluid pump manufacturing

- (a) Four (4) spray paint booths, known as B-1 through B-4, equipped with four (4) airless spray guns, known as A-1 through A-4, and dry filters to control overspray, exhausting through Stacks B-1 through B-4, capacity: 100 pumps per hour, total.
- (b) One (1) natural gas-fired waste water evaporator, known as EV-1, exhausting to Stack EV-1, heat input capacity: 0.353 million British thermal units per hour.
- (c) One (1) natural gas-fired roof top heater, known as RTU-1, constructed in 1996, heat input capacity: 0.180 million British thermal units per hour.
- (d) One (1) natural gas-fired roof top heater, known as RTU-2, constructed in 1996, heat input capacity: 0.080 million British thermal units per hour.
- (e) Four (4) natural gas-fired roof top heaters, known as RTU-3 through RTU-6, constructed in 1996, heat input capacity: 0.250 million British thermal units per hour, each.
- (f) One (1) natural gas-fired roof top heater, known as RTU-7, constructed in 1996, heat input capacity: 0.150 million British thermal units per hour.
- (g) Three (3) natural gas-fired roof top heaters, known as RTU-8 through RTU-10, heat input capacity: 0.180 million British thermal units, each.
- (h) Two (2) natural gas-fired air make up units, known as AMU-1 and AMU-2, constructed in 1996, heat input capacity: 8.25 million British thermal units per hour, each.
- (i) One (1) natural gas-fired two (2) stage caustic water parts cleaner, known as PC-1, constructed in 1996, exhausting to Stack PC-1, heat input capacity: 0.180 million British thermal units per hour.
- (j) One (1) natural gas-fired flash tunnel, known as FT-1, constructed in 1996, exhausting through Stack FT-1, heat input capacity: 3.757 million British thermal units per hour.
- (k) One (1) self-contained dehydrator, known as D-1, capacity: 10 pounds of moisture removal per hour (no emissions).

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the four (4) spray booths, known as B-1 through B-4, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the four (4) spray booths, known as B-1 through B-4, shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emission units and any control devices.

D.1.4 Nonapplicability

- (a) The requirement from CP 003-5029-00238, issued on February 21, 1996, Operation Condition 3 that the input of the surface coatings and solvents to the metal pump coating operations shall be limited such that the production is equivalent to a fixed monthly VOC total of 20.75 tons per month has not been included in this MSOP. The unrestricted potential to emit of VOC is now less than 250 tons per year rendering the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable without a limit. Thus, Operation Condition 3 of CP 003-5029-00238 is hereby rescinded.
- (b) The requirement from CP 003-5029-00238, issued on February 21, 1996, Operation Condition 4 that pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of Tuthill Corporation, Fill-Rite Division must annually submit an emission statement for the facility. This statement which was required to be received by July 1 of each year has not been included in this MSOP. Emission reporting is no longer required for this source because the potential to emit VOC, PM, PM₁₀, CO, NO_x, and SO₂ are now less than one hundred (100) tons per year. Thus, Operation Condition 4 of CP 003-5029-00238 is hereby rescinded.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.6 Particulate Matter (PM)

The dry filters shall be in operation at all times when the four (4) spray booths, known as B-1 through B-4, are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks (B-1 through B-4) while one (1) or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the spray booth stacks (B-1 through B-4) and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
 - (1) The VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
- (b) To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. : _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

* **Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Tuthill Corporation, Fill-Rite Division
Address:	8825 Aviation Drive
City:	Fort Wayne, Indiana 46809
Phone #:	260-747-7529
MSOP #:	003-15783-00238

I hereby certify that Tuthill Corporation, Fill-Rite Division is

☒ still in operation.

☐ no longer in operation.

I hereby certify that Tuthill Corporation, Fill-Rite Division is

☒ in compliance with the requirements
of MSOP **003-15783-00238**.

☐ not in compliance with the
requirements of MSOP **003-15783-
00238**.

Authorized Individual (typed):	Russ Deter
Title:	
Signature:	
Date:	

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Tuthill Corporation, Fill-Rite Division
8825 Aviation Drive
Fort Wayne, Indiana 46809

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal knowledge of the
(Company Name)
representations contained in this affidavit and am authorized to make these representations on behalf of
_____.
(Company Name)
4. I hereby certify that Tuthill Corporation, Fill-Rite Division, 8825 Aviation Drive, Fort Wayne, Indiana 46809, completed construction of the four (4) spray booths, known as B-1 through B-4, on _____ in conformity with the requirements and intent of the Construction Permit application received by the Office of Air Quality on April 1, 2002 and as permitted pursuant to **MSOP No. 003-15783, Plant ID No. 003-00238** issued on .

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____.

My Commission expires: _____.

Signature

Name (typed or printed)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Construction and a Minor Source Operating Permit

Source Background and Description

Source Name:	Tuthill Corporation, Fill-Rite Division
Source Location:	8825 Aviation Drive, Fort Wayne, Indiana 46809
County:	Allen County
SIC Code:	3561
Operation Permit No.:	MSOP 003-15783-00238
Permit Reviewer:	Michael S. Schaffer

The Office of Air Quality (OAQ) has reviewed an application from Tuthill Corporation, Fill-Rite Division relating to the construction and operation of a metal fluid pump coating source.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) natural gas-fired roof top heater, known as RTU-1, constructed in 1996, heat input capacity: 0.180 million British thermal units per hour.
- (b) One (1) natural gas-fired roof top heater, known as RTU-2, constructed in 1996, heat input capacity: 0.080 million British thermal units per hour.
- (c) Four (4) natural gas-fired roof top heaters, known as RTU-3 through RTU-6, constructed in 1996, heat input capacity: 0.250 million British thermal units per hour, each.
- (d) One (1) natural gas-fired roof top heater, known as RTU-7, constructed in 1996, heat input capacity: 0.150 million British thermal units per hour.
- (e) Two (2) natural gas-fired air make up units, known as AMU-1 and AMU-2, constructed in 1996, heat input capacity: 8.25 million British thermal units per hour, each.
- (f) One (1) natural gas-fired two (2) stage caustic water parts cleaner, known as PC-1, constructed in 1996, exhausting to Stack PC-1, heat input capacity: 0.180 million British thermal units per hour.
- (g) One (1) natural gas-fired flash tunnel, known as FT-1, constructed in 1996, exhausting through Stack FT-1, heat input capacity: 3.757 million British thermal units per hour.
- (h) One (1) self-contained dehydrator, known as D-1, capacity: 10 pounds of moisture removal per hour (no emissions).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

- (a) Four (4) spray paint booths, known as B-1 through B-4, equipped with four (4) airless spray guns, known as A-1 through A-4, and dry filters to control PM overspray, exhausting through Stacks B-1 through B-4, capacity: 100 pumps per hour, total.
- (b) One (1) natural gas-fired waste water evaporator, known as EV-1, exhausting to Stack EV-1, heat input capacity: 0.353 million British thermal units per hour.
- (c) Three (3) natural gas-fired roof top heaters, known as RTU-8 through RTU-10, heat input capacity: 0.180 million British thermal units, each.

Emission Units and Pollution Control Equipment Removed

The following facilities will no longer operate and/or have not been included in this proposed permit:

- (a) Two (2) high volume low pressure (HVLP) spray booths for metal coating, known as booths Auto 1 and Manual 1, maximum capacity of 720 pumps per hour, with dry filters for overspray control, exhausting at one (1) stack with a flow rate of 13,005 acfm.
- (b) One (1) natural gas-fired high bake, known as HBO-1, heat input capacity: 1.65 million British thermal units per hour.
- (c) One (1) natural gas-fired low bake oven, known as LBO-1, constructed in 1996, exhausting through Stack LBO-1, heat input capacity: 3.20 million British thermal units per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 003-5029-00238, issued on February 21, 1996;
- (b) AA 003-6126-00238, issued on August 13, 1996;
- (c) Registration CP 003-6360-00238, issued on September 12, 1996; and
- (d) AA 003-6969-00238, issued on November 8, 1996.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) CP 003-5029-00238, issued on February 21, 1996

Operation Condition 3 - The input of the surface coatings and solvents to the metal pump coating operations shall be limited such that the production is equivalent to a fixed monthly VOC total of 20.75 tons per month. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

Reason not incorporated: This source has significantly changed its equipment and shall now be permitted with a Minor Source Operating Permit (MSOP) pursuant to 326 IAC 2-6.1. The previous VOC emission limit is not necessary because the unrestricted potential emissions of all the criteria pollutants are now less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7, as well as 326 IAC 2-2 and 40 CFR 52.21 are not applicable.

- (b) CP 003-5029-00238, issued on February 21, 1996

Operation Condition 4 - Pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of Tuthill Corporation, Fill-Rite Division must annually submit an emission statement for the facility. This statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4.

Reason not incorporated: Emission reporting is no longer required for this source because this source is located in Allen County and the potential to emit VOC, PM, PM₁₀, CO, NO_x, and SO₂ is less than one hundred (100) tons per year.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
B-1	Spray booth	39.0	2.00	8,000	Ambient
B-2	Spray booth	39.0	2.00	8,000	Ambient
B-3	Spray booth	39.0	2.00	8,000	Ambient
B-4	Spray booth	39.0	2.00	8,000	Ambient
EV-1	Waste Water Evaporator	39.0	0.660	750	167
FT-1	Flash Oven	39.0	0.390	1,992	135
PC-1	Caustic Water Parts Cleaner	27.0	0.700	750	Unknown

Enforcement Issue

IDEM is aware of the following enforcement issues:

- (a) The source was not issued a FESOP by December 13, 1996 nor did they submit a Part 70 application by that date.
- (b) The source should have submitted an application for an MSOP by December 25, 1999.
- (c) The source failed to comply with Operation Condition 4 of CP 003-5029-00238, issued on February 21, 1996, which required an annual emissions report by July 1 of each year pursuant to 326 IAC 2-6.

Therefore, an enforcement referral has been filed. IDEM is reviewing this matter and will take appropriate action.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 1, 2002, with additional information received on May 10 and 21, 2002 and June 4, 2002.

Emission Calculations

See Appendix A pages 1 through 3 of 3 of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	34.8
PM ₁₀	35.4
SO ₂	0.060
VOC	9.44
CO	8.37
NO _x	9.96

HAPs	Potential To Emit (tons/year)
Glycol Ethers	6.19
Benzene	0.0002
Dichlorobenzene	0.0001
Formaldehyde	0.008
Hexane	0.179
Toluene	0.0003
Lead	0.00005
Cadmium	0.0001
Chromium	0.0001

HAPs	Potential To Emit (tons/year)
Manganese	0.00004
Nickel	0.0002
TOTAL	6.38

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM₁₀ is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data for 1996 - 2000 have been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Four (4) Spray Booths (B-1 through B-4)	0.346	0.346	-	8.89	-	-	6.19
Natural Gas Combustion (RTU-1 through RTU-10, AMU-1 & AMU-2, EV-1, PC-1, and FT-1)	0.189	0.757	0.060	0.548	8.37	9.96	0.188
Total Emissions	0.535	1.10	0.060	9.44	8.37	9.96	6.38
Part 70 (Title V) Threshold Levels	Not Applicable	100	100	100	100	100	Single 10 Total 25

*Note that the self-contained dehydrator, known as D-1, does not have any emissions.

This existing source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Allen County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source's total emissions indicated this permit MSOP 003-15783-00238, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than one hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) any combination of HAPs is less than twenty-five (25) tons per year.

The change in the potential to emit of the entire source is due to significant changes in equipment and coatings. This status is based on this proposed air approval to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) There are still no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The one (1) natural gas-fired caustic water parts cleaner, known as PC-1 is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Part 63, Subpart T, because the caustic water parts cleaner does not use halogenated solvents.
- (c) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit VOC, PM, PM₁₀, CO, NO_x, and SO₂ is less than one hundred (100) tons per year, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the four (4) spray booths, known as B-1 through B-4 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the four (4) spray booths, known as B-1 through B-4, are in operation, in order to comply with this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

This source is classified as SIC #35, is located in Allen County, and the potential to emit from the four (4) proposed spray booths, known as B-1 through B-4, is greater than fifteen (15) pounds per day,

total. Therefore, the requirements of 326 IAC 8-2-9 are applicable.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the four (4) spray booths, known as B-1 through B-4 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booths are in compliance with this requirement.

326 IAC 8-3-2 (Cold Cleaner Operations)

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The one (1) natural gas-fired two (2) stage caustic water parts cleaner, known as PC-1, constructed in 1996, is not subject to the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5 because the caustic water parts cleaner does not use cleaning materials containing any VOCs.

Conclusion

The construction and operation of this metal fluid pump coating source shall be subject to the conditions of the attached proposed Minor Source Operating Permit 003-15783-00238.

**Appendix A: Emissions Calculations
VOC , Particulate and HAPs
From Surface Coating Operations**

Page 1 of 3 TSD App A

**Company Name: Tuthill Corporation, Fill-Rite Division
Address City IN Zip: 8825 Aviation Drive, Fort Wayne, Indiana 46809
MSOP: 003-15783
Pit ID: 003-00238
Reviewer: Michael S. Schaffer
Date: April 1, 2002**

VOC and PM Emissions

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Booths B-1,2,3 & 4																
Black	8.54	64.35%	55.6%	8.8%	56.5%	31.00%	0.023	100	1.72	0.75	1.72	41.25	7.53	27.6	2.41	10%
Red	8.78	61.75%	51.7%	10.0%	53.8%	38.00%	0.023	100	1.91	0.88	2.03	48.64	8.88	30.4	2.32	10%
Yellow	9.00	57.60%	49.8%	7.8%	53.9%	36.00%	0.023	100	1.52	0.70	1.61	38.75	7.07	34.6	1.95	10%
Fugitive																
Isopropyl Alcohol	6.60	100.00%	0.0%	100.0%	0.0%	0.00%	0.000004	100	6.60	6.60	0.002	0.055	0.010	0.00	N/A	100%

State Potential Emissions

Add worst case coating to all solvents

PM

Control Efficiency

99.00%

Uncontrolled

Worst Case

2.03

48.7

8.89

34.6

Controlled

Worst Case

2.03

48.7

8.89

0.346

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Haps Emissions

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol	Glycol Ether Emissions (tons/yr)
				Ether	
Booths B-1,2,3 & 4					
Black	8.54	0.023	100	6.00%	5.16
Red	8.78	0.023	100	7.00%	6.19
Yellow	9.00	0.023	100	5.00%	4.53

Individual Total Worst Case 6.19

Overall Total Worst Case 6.19

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Page 2 of 3 TSD App A

**Company Name: Tuthill Corporation, Fill-Rite Division
Address City IN Zip: 8825 Aviation Drive, Fort Wayne, Indiana 46809
MSOP: 003-15783
Plt ID: 003-00238
Reviewer: Michael S. Schaffer
Date: April 1, 2002**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

25.4

222.50

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.211	0.846	0.067	11.13	0.612	9.35

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Units

RTU-1

RTU-2

RTU-3 - RTU-6

RTU-7

AMU-1 & AMU-2

EV-1

PC-1

FT-1

LBO-1

Rating in mmBtu's/hr

0.180

0.080

0.250, each

0.150

8.25, each

0.353

0.180

3.757

3.20

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions**

Page 3 of 3 TSD App A

**Company Name: Tuthill Corporation, Fill-Rite Division
Address City IN Zip: 8825 Aviation Drive, Fort Wayne, Indiana 46809
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HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.0002	0.0001	0.0083	0.2003	0.0004

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	0.00006	0.00012	0.00016	0.00004	0.00023	0.210

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Units

RTU-1
RTU-2
RTU-3 - RTU-6
RTU-7
AMU-1 & AMU-2
EV-1
PC-1
FT-1
LBO-1

Rating in mmBtu's/hr

0.180
0.080
0.250, each
0.150
8.25, each
0.353
0.180
3.757
3.20